PCBs	15
TCLP Pb	0.99
SACM	NS

NORTH PILE BACKGROUND SAMPLE

ID	DEPTH	PCBs	TCLP Pb	SACM
A-5	H3	ND	NS	ND
A-5	H2	ND	<0.10	NS
A-5	H1	ND	NS	NS

ID	DEPTH	PCBs	TCLP Pb	SACM
E-5	H3	3.4	NS	ND
E-5	H2	4.3	0.13	ND
E-5	H1	0.42	NS	ND

ID	DEPTH	PCBs	TCLP Pb	SACM
I-5	H3	0.69	NS	ND
I-5	H2	0.43	0.59	ND
I-5	H1	0.73	NS	NS

DECON AREA #2

PCBs	13.4
TCLP Pb	2.2

PCBs	0.38
TCLP Pb	ND

PCBs	6.8
TCLP Pb	10.6

PCBs	ND
TCLP Pb	ND

PCBs	0.69
TCLP Pb	0.037

WEST PILE BACKGROUND SAMPLE

PCBs	ND
TCLP Pb	0.99
SACM	NS

ID	DEPTH	PCBs	TCLP Pb	SACM
E-3	H3	2.1	NS	ND
E-3	H2	4.6	0.38	ND
E-3	H1	0.92	NS	ND

ID	DEPTH	PCBs	TCLP Pb	SACM
I-3	H3	ND	NS	ND
I-3	H2	1.6	0.86	ND
I-3	H1	2.7	NS	NS

ID	DEPTH	PCBs	TCLP Pb	SACM
A-3	H3	4.3	NS	NS
A-3	H2	4.6	0.83	NS
A-3	H1	8.3	NS	ND

PCBs	ND
TCLP Pb	0.023

PCBs	ND
TCLP Pb	0.03

ID	DEPTH	PCBs	TCLP Pb	SACM
E-1	H3	4.0	NS	ND
E-1	H2	0.81	0.32	ND
E-1	H1	2.6	NS	NS

PCBs	ND

ID	DEPTH	PCBs	TCLP Pb	SACM
J-1	H3	2.5	NS	ND
J-1	H2	7.4	0.16	ND
J-1	H1	ND	NS	ND

ID	DEPTH	PCBs	TCLP Pb	SACM
A-1	H3	ND	NS	NS
A-1	H2	ND	<0.10	ND
A-1	H1	1.7	NS	ND

ID	DEPTH	PCBs	TCLP Pb
K-1	H3	ND	<0.10
K-2	H3	ND	<0.10
K-3	H3	ND	<0.10

DECON AREA #1

MULTI-LEVEL SAMPLING LEGEND

SAMPLE POINT	DEPTHS SAMPLED
A1, A3, A5 E3, E5 I3, I5	0-5', 5-7' AND 7-10'
E1, J1	0-4', 4-7' AND 7-10'
K1, K2, K3	SINGLE LEVEL SAMPLING
H3	TOP LAYER OF SOIL HORIZON
H2	MIDDLE LAYER OF SOIL HORIZON
H1	BOTTOM LAYER OF SOIL HORIZON

LEGEND

- TOPOGRAPHICAL CONTOUR (FEET)
- TEST EXCAVATION
- SOIL SAMPLE LOCATION
- SOIL SAMPLE LOCATION COLLECTED BY OTHERS **LOCATIONS ARE ESTIMATES ONLY**
- ND NOT DETECTED ABOVE LAB DETECTION LIMITS
- NS NOT SAMPLED
- SACM SUSPECTED ASBESTOS CONTAINING MATERIALS
- UNITS PCBs IN MG/KG, TCLP Pb IN MG/L

0 10
APPROX. SCALE (FEET)

GO environmental, LLC

Figure 1: Preliminary Materials Sampling Plan

Construction Materials Processing Facility
Richard White Way
Fairfield, Connecticut

Job No. 381.2768.02.17 | D/B: TLD | DATE: 02/17

TABLE 11
Waste Characterization Sample Analyses
Hazelton Creek Properties, LLC Disposal Facility – Moosic & Hazelton, PA
Reclamation Yard – Fairfield, Connecticut

Sample I.D.: Sample Date:	WC-1 5-24-17	WC-2 5-24-17	WC-3 5-24-17	WC-4 5-24-17	RCRA Hazardous Waste Concentration
VOCs - Method 8260 (mg/kg)					
All VOCs Tested	ND	ND	ND	NA	--
SVOCs - Method 8270 (mg/kg)				NA	
Anthracene	< 0.26	0.33	0.33		--
Benzo(a)anthracene	0.64	1.1	1.3		--
Benzo(a)pyrene	0.64	1.1	1.6		--
Benzo(b)fluoranthene	0.61	1.2	1.8		--
Benzo(g,h,i)perylene	0.52	0.95	1.0		--
Benzo(k)fluoranthene	0.62	1.0	1.9		--
Benzyl Butyl Phthalate	< 0.26	1.0	0.49		--
Bis(2-ethylhexylphthalate)	< 0.26	0.49	< 0.26		--
Chrysene	0.78	1.4	2.0		--
Fluoranthene	1.3	2.6	3.1		--
Indeno(1,2,3-cd)pyrene	0.45	0.8	1.2		--
Phenanthrene	0.83	1.4	1.7		--
Pyrene	1.2	2.4	2.6		--
All other SVOCs Tested	ND	ND	ND		--
Total PCBs – Method 8082 (mg/kg)	2.1	3.9	0.51	3.1	--
Total Priority Pollutant Metals (mg/kg)				NA	
Arsenic	4.08	5.17	2.15		--
Beryllium	0.61	0.45	0.35		--
Cadmium	1.08	1.74	0.38		--
Chromium	23.9	21.0	20.8		--
Copper	61.6	87.6	28.4		--
Mercury	0.13	0.26	< 0.03		--
Nickel	20.9	26.9	14.5		--
Lead	185	160	23.8		--
Zinc	255	430	72.3		--
TCLP Priority Pollutant Metals (mg/L)				NA	
Lead	0.26	0.13	< 0.1		5.0 mg/L
Zinc	1.24	2.6	0.15		--
All other Metals	ND	ND	ND		--

ND – Not Detected above laboratory detection limits. NA – Not Analyzed for this procedure.

The compounds listed above are those that were detected - please see laboratory reports for full lists of compounds and their specific detection limits.

Logical Environmental Solutions LLC

354 South River Road Tolland, CT 06084 Tel: (860) 870-1780 Fax: (860) 870-1778

June 12, 2017

Janet Kwiatkowski
CTDEEP PCB Program
79 Elm Street
Hartford, Connecticut 06106

Re: Sampling Plan - Revised
Town Reclamation Yard
Richard White Way
Fairfield, Connecticut

Janet:

The following summarizes the proposed soil sampling plan following the removal of the PCB impacted soil and debris pile that was improperly placed on the Town Reclamation Yard property in Fairfield, Connecticut. The vacant property is situated in a GB classified groundwater area. Since the discovery of the contaminated material, the Town has collected forty-three soil and debris samples from the pile for the analysis of PCBs, leachable (via TCLP) lead, and asbestos. Of those samples, asbestos was not detected in any of the debris or soil samples, and the soil samples contained PCBs at concentrations ranging from < 0.23 mg/kg to 15 mg/kg. Leachable lead was detected at concentrations ranging from < 0.1 mg/L to 2.2 mg/L. Based upon our previous telephone discussions, you indicated that the disposal of the material can be handled through the Connecticut Department of Energy and Environmental Protection's PCB Program and would not constitute involvement through the EPA as TSCA-regulated waste.

The Town has contracted with Connecticut Tank Removal (CTR) to segregate the bulky debris including concrete and boulders from the approximate 1,600 cubic yard pile, and direct load the smaller sized debris and soil for transport and reuse at Hazelton Creek Properties, LLC in Hazelton, Pennsylvania. All work will be completed under the direction of Logical Environmental Solutions, LLC (LES). The attached table summarizes the results of the waste characterization samples collected for the facility based upon their sampling requirements. PCBs were detected at total concentrations ranging from 0.51 mg/kg to 3.9 mg/kg and leachable lead concentrations ranged from < 0.1 mg/L to 0.26 mg/L. Any soil adhering to the bulky debris will be physically removed by CTR personnel for transport to Hazelton Creek and the debris will be placed on and covered by polyethylene sheeting. The bulky debris will be sampled by LES in accordance with the EPA's protocols for sampling porous material in the field and analyzed for PCBs using the Method 3540C Soxhlet Extraction/Method 8082. The debris will be disposed of/recycled at Hazelton Creek Properties, LLC if PCB concentrations range from 1 mg/kg to 25 mg/kg, or at J.J. Brennan of Shelton, Connecticut if less than 1 mg/kg.

All soil and debris sampling equipment will be decontaminated between and after use with a double wash/rinse method using Simple Green® (or other approved solvent) and disposable scrubbers and absorbent pads. CTR's heavy equipment will also be decontaminated prior to leaving the site. CTR will construct a lined decontamination pad to collect any fluids generated for proposer disposal. All decontamination solids and liquids will be drummed and disposed of by CTR at a Town-approved facility. Following decontamination, LES will collect confirmatory wipe samples from any equipment that comes in contact with potentially PCB-contaminated waste.

During the pile segregation and removal activities, LES will also conduct air monitoring for fugitive dusts using a real-time direct-reading particulate meter. Readings will be collected both within the work zone breathing areas and fence-line to document potential airborne contaminants in dusts are not creating health risks for onsite workers and adjacent property occupants. If dust levels exceed 150 micrograms per cubic meter (ug/m^3) for a period exceeding 5 minutes, LES will require work to be halted until the dust can be controlled by CTR using water, cover, or some other approved method. LES will also collect daily air samples from the upwind and downwind fence-line areas for analysis of PCBs (Method TO-10) using the low-flow polyurethane foam (PUF) sample collection methodology.

Following CTR's removal of the PCB-contaminated fill pile, along with an approximate one-foot vertical and horizontal buffer, LES will collect confirmation soil samples of the underlying soil and adjacent soil pile sidewalls to ensure the extent of the contaminated material has been removed from the site. Confirmation soil sampling will be conducted in a 1.5 meter grid across the entire area to document the removal of PCB impacted material exceeding 1 mg/kg. The confirmation soil samples will be collected as discrete, in-place samples, and the soil will not be mixed or diluted with other material. All samples will be analyzed for PCBs using EPA Method 3540C soxhlet extraction/EPA Method 8082. LES will prepare a report that documents the investigation, remediation, disposal, and verification activities conducted at the site.

If there are any questions or concerns regarding the remediation activities, or post-remediation sampling proposed for the site, please do not hesitate to contact me at 860-402-7069 (mobile) or 860-870-1780 (office), or via email at ck@logicalenvironmental.com.

Very Truly Yours,
Logical Environmental Solutions

Cindy Knight

Cindy Knight, LEP, CHMM, CPESC, CPG
President

cc: Brian Carey, Town of Fairfield